

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

Periodic Reporting
(Proposal Six)

Docket No. RM2021-9

COMMENTS OF THE GREETING CARD ASSOCIATION

The Greeting Card Association (GCA) files these comments pursuant to Order No. 5992. GCA, as the postal trade association which speaks for the citizen mailer, has a particular interest in Single-Piece First-Class letters. The proposal in this Docket, whatever its merits as a feature of Metered Letters and the Nonautomation Presort rates based on the Metered Letter benchmark, has potential consequences for the Single-Piece letter customer. These comments explain the related concerns.

The Postal Service's proposal. Proposal Six is offered as a response to the Commission's direction, in Order 5937, to develop an improved replacement for the unitary Metered Letters benchmark, as a starting point for Nonautomation Presort rates. The Service proposes separate benchmarks for machinable and non-machinable pieces and explains how they were arrived at.

The Petition states that because the In-Office Cost System (IOCS), which grounds the existing Metered Letters benchmark, does not distinguish between machinable and non-machinable letters, and because of the small population of non-machinable pieces, the Postal Service has used its cost models (rather than observed data) to develop its proposed benchmarks. The machinable/non-machinable cost difference thus arrived at is large: \$0.31701.¹

¹ *Petition of the United States Postal Service for the Initiation of a Proceeding to Consider Proposed Changes in Analytical Principles (Proposal Six) ("Petition")*, p. 4, Table 1.

Consequences of developing benchmarks through cost modeling. Any development of a benchmark necessarily implies that the piece represented by the benchmark requires all the operations relevant to the workshared rate(s) for which the benchmark is wanted. Otherwise, the avoided cost could be understated. If the worksharing involved could eliminate the need for operations α , β , and γ , then the benchmark calculation should assume that operations α , β , and γ are required for the non-workshared benchmark piece.

When a benchmark is developed through cost modeling, as is proposed here, the same proposition applies. The (known) cost of the relevant operations is included in the modeled benchmark and is assumed away in the case of the workshared piece.

Benchmarking vs. ratemaking for a product. Developing and using a benchmark is essentially – perhaps necessarily – a “piece vs. piece” exercise. As such, it does not consider the possibility that a significant proportion of the non-workshared volume may in fact *not* require all the operations assumed in the benchmark and assumed away in setting the worksharing rate. The mail flow exhibit for “First-Class Bulk Nonmachinable Metered Letters” attached to the Petition in this docket shows that of 10,000 pieces modeled all were entered at “Out Prim Man” (i.e., outgoing primary manual sorting) and none at any other entry point. This implies that every piece labeled “non-machinable” *must* be hand sorted. That, however, may not be the real-world situation. (In the next section we show why it most probably is not.)

For this reason, a cost, or (as here) a cost difference developed in the benchmarking process cannot be mechanically transferred to the very different process of setting rates. If the rate for a product is to bear an intelligible relation to its cost, then the possibility justifiably ignored in the benchmarking process must be taken into account. This means that for the purpose of setting a non-machinable surcharge for Single-Piece letters, the \$0.31701 cost difference calculated in the Petition cannot be directly incorporated into Single-Piece rates.

Likelihood of non-machinable letters not requiring manual processing. That the argument in the preceding paragraph is not purely theoretical has been shown by experimental evidence. In Docket R2006-1, GCA presented the results of a mailing experiment. It is fully described in GCA-T-3 (Morrissey) in that docket; a copy of that testimony is attached as Appendix A.

The experiment involved the mailing of 504 rectangular (machinable) and 504 square (officially “non-machinable”) greeting cards. They were mailed from several different parts of the country to the witness’s Washington, DC office, where they were inspected individually for evidence of (i) machine (facers-canceller) cancellation and (ii) machine sorting. One tranche of cards arrived with no cancellations at all; they are omitted in the first column of Table A but included in the second, where we have arbitrarily treated as if they had been hand canceled:

Table A. Successfully processed on the AFCS		
	Canceled cards	All cards
Square cards	80.45%	70.44%
Rectangular cards	91.84%	80.36%

Machine cancelation vel non was not an issue in assessing the behavior of the cards in sorting machinery:

Table B. Successfully machine sorted		
	Canceled cards	All cards
Square cards	---	95.24%
Rectangular cards	---	100.00%

The Postal Service objected to the design of the experiment, and to its failure to observe the pieces *during* processing², but did not challenge the numerical results summarized in the Tables. Our point is not to relitigate the issue as it arose in Docket R2006-1, but to emphasize that not every piece of mail labeled “non-machinable” in fact requires manual processing, and that a cost difference developed for benchmarking does not reflect how the non-machinable mail in question actually behaves in processing, nor what it actually costs. The high success rates for square cards, summarized in Tables A and B, show that a substantial proportion of officially “non-machinable” pieces are, in practice, not non-machinable at all.

The Commission has said³ that a rate which is excessive for the customer is not a “just” rate, within the meaning of 39 U.S.C. sec. 3622(b)(8). GCA submits that a rate which assumed the necessity, for every piece in a given mail type, of every operation which might be avoided by worksharing, when operational experience shows that no such necessity exists, would be excessive in the Commission’s sense.

Conclusion. The Commission may find the Postal Service’s proposed bifurcated benchmark acceptable. If it does, however, it should make clear that the cost difference of approximately \$0.317 calculated to support it is *not* a proper basis for setting rates for non-machinable (or any other) letter mail since it bears no necessary relation to the actual cost of such mail.

October 28, 2021

Respectfully submitted,

GREETING CARD ASSOCIATION

² USPS-RT-16 (revised November 30, 2006) (Laws). The witness did not explain how this type of observation could have been carried out. An earlier joint GCA-Postal Service experiment, discussed by this witness, showed that about half the square cards tested were “successfully cancelled and processed.” USPS RT-16, p. 12.

³ See especially Docket RM2017-3, Order No. 4257, pp. 114 et seq.

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Docket No. RM2021-9
Greeting Card Association

APPENDIX A

1 I am sponsoring one Category 2 library reference, GCA LR-L-1. This is a PDF file
2 containing images of the fronts and backs of the test mailed envelopes

3 III. THE PROPOSED CHANGES PERTAINING TO SQUARE-SHAPED SINGLE- 4 PIECE FIRST-CLASS LETTERS

5 A. Background; the GCA experiment

6 In the proposal for rate adjustment currently under review, the United States
7 Postal Service proposes to restructure the rate design for single-piece First-Class
8 Letter mail. It would divide the subclass into three shape-based divisions,
9 Letters, Flats, and Parcels, with Flats paying a higher first-ounce rate than
10 Letters, and Parcels, higher than Flats.¹ The proposed design would eliminate
11 the current surcharge for non-standard envelopes in the single piece First Class
12 Mail category. Pieces currently subject to the surcharge (currently 13 cents)
13 would be charged the rate proposed for flats

14 This change would result in a 20 cent additional cost for sending a square
15 shaped letter-size envelope, a 50% increase in the price for sending such a mail
16 piece.²

17 The Postal Service has rationalized the additional charge for such low aspect
18 ratio envelopes on the basis that they are non-machinable and thus subject to
19 extra costs incurred in being processed by hand.³ The Greeting Card Association
20 conducted an experiment to determine the degree to which square envelopes
21 can not be processed on Postal Service automated cancellation and sorting
22 equipment. I helped design and administered the experiment and this section of

¹ For single-piece mail, the rates are \$0.42, \$0.62, and \$1.00, respectively.

² That is: \$0.62 - \$0.42 = \$0.20. The effective 20-cent “surcharge” is 153.8 percent of the 13-cent non-machinable surcharge now in effect.

³ See, e.g., witness Taufique’s response to GCA/USPS-T32-3.

1 my testimony describes the experiment methodology, its results and our
2 conclusions.

3 We determined that a sample size of roughly 500 mail pieces would produce a
4 statistically useful assessment of how square shaped letter pieces are cancelled
5 and sorted.⁴ Accordingly, our experiment consisted of 504 square cards and
6 envelopes that are currently subject to the non-standard surcharge. In addition,
7 a control group of 504 rectangular cards and envelopes not subject to the
8 surcharge was utilized to compare the performance of the two types of mail
9 pieces in the system.

10 The GCA could not practicably extract a sample of non-standard envelopes from
11 the mail stream. The square test cards were intended to serve as a proxy
12 sample. They represent one size of an important shape with respect to greeting
13 cards, invitations and notices. Further, the identified processing problem was the
14 alleged tendency of non-standard mail to “roll” in the Advanced Facer Cancellor
15 System (AFCS). The GCA square shaped test envelope is likely to be the very
16 shape most likely to roll. In addition, the GCA test offers a comparison between
17 the processing of the square shaped and standard shaped mailed test
18 envelopes.

19 Both sets of cards were divided among eight experiment participants located in a
20 number of different geographic regions. They were assigned the task of mailing
21 to a central location the test sets described below. The regions in the experiment
22 included West Coast (CA), Rocky Mountains (CO), Upper Midwest (MN),
23 Midwest (MO), Southwest (TX), Great Lakes (OH), Mid-Atlantic (VA) and
24 Northeast/ New England (RI). A complete list of participants may be found in
25 Appendix A.

⁴ According to GCA/USPS-T32-4, FY 2005 single piece non-machinable surcharge volume for letter shaped pieces was 124,339,997. Dividing this figure by 365 results in a proxy daily figure of 340,657. Given a population of 340,657 and sample sizes of 504 and 441, I am informed by Dr. Claude Martin (GCA's market survey witness) that the respective 95% confidence intervals are +/-4.5 for 504 and +/-4.8 for 441.

1 Each of the participants received a package containing 63 square and 63
2 rectangular cards and envelopes. All of the cards were sealed in their
3 envelopes. The envelopes were addressed to me with laser printed labels and
4 each envelope had a laser printed return address with a unique identifying
5 number for each envelope. This number was a combination of the participant's
6 initials, an S or R denoting the type of envelope (square and rectangular
7 respectively) and a number from 001-063. Thus, Mr. Trumble's first square card
8 would bear the identifying number TTS001 and so forth. Every envelope bore
9 the appropriate amount of postage based on its shape.

10 Each of the participants was asked to deposit his or her cards in the mail in
11 whatever fashion he or she normally uses, i.e. office outgoing mail, a mail box or
12 deposit at their local post office. I spoke with each participant to verify that they
13 had all of their cards and that they understood the procedure for mailing the
14 cards. All of the cards were mailed on July 20, 2006. Appearing at Exh. GCA-T-
15 3-A are declaration statements detailing the mailers activity with regard to the
16 experiment.⁵

17 As the envelopes were received, I logged them individually into a pre-prepared
18 spreadsheet and examined them for visible signs of manual or machine
19 processing based on my understanding of how to make such determinations
20 pursuant to the responses to GCA interrogatories to Postal Service witness
21 McCrery. For purposes of determining method of cancellation, I looked for either
22 the machine printed cancellation mark containing printed text and a series of
23 wavy lines or the round cancellation stamp indicating manual cancellation.
24 These markings were described in witness McCrery's answer to GCA/USPS-
25 T42-5 and -6. For an indication as to how the envelopes were sorted and
26 processed, I looked for either a printed bar code or an I.D. tag in orange

⁵ I did not receive a declaration from SET mailer Hamilton Davison (whose company experienced serious financial difficulties immediately following the SET). However, I spoke with Mr. Davison on July 19, 2006, the day before he was due to mail his SET envelopes from Rhode Island. There is every reason to believe that Mr. Davison in fact mailed his SET envelopes in accordance with the test instructions, and I in fact received all of his envelopes, which show Providence, Rhode Island postmarks for July 20, 2006 and July 21, 2006.

1 fluorescent ink. For these markings I relied on Mr. McCrery's response to
2 GCA/USPS-T42-5, as well as his testimony (USPS-T42, pages 2-13). The
3 absence of any bar code or I.D. tag was interpreted to indicate that the envelope
4 had been sorted manually. All of this information was included in the
5 spreadsheet program which was set up to total the percentages of cards
6 cancelled by automation or manually and to determine what percentage were
7 sorted via automation or manual processing. The spreadsheet is attached to my
8 testimony as Exh. GCA-T-3B, and, as noted above, the cards themselves have
9 been filed with the Commission as Library Reference GCA-LR-L-1.

10 Based on an analysis of all cards received (no cards failed to arrive) my analysis
11 reveals the following results:

12 **Percentage of Total Sample Cancelled on AFCS**

13 **Square:** 80.45*

14 **Rectangular:** 91.84

15 * These figures exclude the card sets from participant Tom Trumble. None of his
16 card sets- both square and rectangular- showed any type of cancellation
17 whatsoever. Neither we nor the Postal Service can account for what may have
18 happened. Witness McCrery speculated that such pieces might have been
19 rejected by the AFCS and not subsequently cancelled by hand, or that the
20 machine itself did not function properly.⁶ In this case, we might argue that since
21 Mr. Trumble's rectangular pieces also arrived without cancellations, rejection by
22 the AFCS is perhaps a less likely explanation – but any explanation would be
23 purely speculative, and no one really knows. If we treated Mr. Trumble's square
24 and rectangular cards as having been hand cancelled (the lack of any
25 cancellation marks notwithstanding), the respective success rate for automated
26 cancellation for the entire population of cards would be:

⁶ TR. 11/3253-3254.

1 **Square:** 70.44 **Rectangular:** 80.36

2 In addition to the averages for the entire sample, an analysis of the individual
3 experiment participants' cards produced the following observations:

4 Of the various geographic regions the lowest rate of AFCS cancellation for
5 square cards other than Mr. Trumble's set occurred in Ms. Gilchrist-Wells' set at
6 42.86%. The highest rate of successful AFCS cancellation of square cards
7 occurred in Ms. Hale's sample with 100% having been cancelled by the
8 equipment. Indeed the average AFCS success rate for all participants' card sets
9 was 70.44%. If Mr. Trumble's cards are excluded the average success rate for
10 all participants was 80.45%.

11 **Percentage of Total Sample Sorted Via Automation**

12 **Square:** 95.24

13 **Rectangular:** 100

14 The success rate for automated sorting of the card samples was even higher.
15 The lowest percentage of square cards bearing marks of automated sorting was
16 Mr. Davison's set at 76.19%. Numerous participants' sets indicated that 100% of
17 their square cards had been sorted on automated equipment. In fact, the
18 average success rate for automated sorting of the square card sets was
19 95.24%.⁷ Using the same standard for assessing how the piece was processed,
20 I found that 100% of all participants' rectangular cards were successfully sorted
21 on the automated equipment.

22 **B. Conclusions; GCA policy recommendation**

23 While acknowledging that there is a measurable difference between the
24 performance of square envelopes and that of rectangular envelopes in Postal

⁷ Postal Service witness McCrery states that pieces rejected by the Advanced Facer Cancellor System (AFCS) may be processed on automation equipment after being hand cancelled. See responses to GCA/USPS-T42-1(b)(1), GCA/USPS-T42-4.

1 Service automated equipment, it is the conclusion of the Greeting Card
2 Association that the difference observed does not support the increase in the
3 cost to send such cards as would be imposed by assessing them the Flats rate
4 as proposed by the Postal Service. Not only do the results of this experiment
5 suggest that a 7 cent increase in the cost to send such a card is not justifiable,
6 but also the strong possibility exists that the 13 cent surcharge currently in place
7 is too high or perhaps even unnecessary altogether.

8 To place this issue in perspective, we should recall that the square letter-shape
9 pieces which GCA tested form only a portion – and not a particularly large one –
10 of the mail subject to the present non-machinable surcharge. According to
11 information supplied by the Postal Service, only about 28 percent of the single-
12 piece mail subject to the surcharge comprised letter-shape pieces; about 69
13 percent were flats and 3 percent parcels.⁸ Moreover, according to the non-
14 machinability criteria used by the Service as the basis for the proposal⁹, low
15 aspect ratio is only one possible cause of non-machinability: a letter may also
16 have too high an aspect ratio (i.e., greater than 2.5:1) or be too thick (more than
17 one-quarter inch). Consequently, the sub-type of First-Class Letter mail which
18 GCA recommends not be taxed with an effective 20-cent surcharge represents
19 only one segment of the relevant letter-shape mail, which in turn is less than 30
20 percent of the surchargeable volume.

21 The fact that most non-machinable pieces are flat-shape is also important
22 because of the widely-differing mail flows, and associated costs, that
23 characterize letter-shape and flat-shape pieces. Single-piece letters and flats are

⁸ Witness Taufique's response to GCA/USPS-T32-4. The volumes were 124.3 million letters, 303.3 million flats, and 12.0 million parcels (FY 2005 Base Year volumes).

⁹ USPS-T-32, p. 19, listing length, height, width, thickness, rigidity, variation in thickness, and aspect ratio as the relevant criteria. See also *Domestic Mail Manual*, § 101, 1.0 (maximum and minimum size for letters) and 1.1 (non-machinability criteria).

1 both cancelled and sorted on different machines.¹⁰ Correspondingly, flat- and
2 letter-shape pieces have significantly different costs. Witness Taufique
3 developed his rate levels by adding together the differences between letter-
4 shape and flat-shape processing and delivery costs¹¹, and adjusting the result to
5 arrive at his proposed rate.

6 In this connection, it is not unimportant that the letter- and flat-shape costs used
7 by witness Taufique represented single-piece letters and flats as aggregates.
8 That is, the low-aspect-ratio letters on which GCA is focusing were already
9 reflected in the costs underlying his rate differential calculation. Insofar as those
10 pieces do impose additional costs on the Service – and the results of GCA’s
11 experiment suggest that any such costs would be minimal – the aggregate
12 figures provided by witnesses Smith and Kelley already reflected them.

13 In summary, then, it appears that the proposed rate design would assimilate low-
14 aspect-ratio single-piece letters to the Flats category without adequate reason.
15 These pieces are both cancelled and processed as letters¹² – apparently with a
16 favorable if not ideal level of success so far as machine cancellation is
17 concerned, and with an extremely high level of success as regards machine
18 sorting. They are delivered as letters¹³, so that their cost is reflected in the
19 approximately 7.7-cent/piece cost to deliver letter-shape pieces, rather than the
20 14.3-cent/piece cost to deliver flats. Since the apparent purpose of drawing a
21 division between Letters and Flats for rate purposes is to reflect costs more

¹⁰ The different mail flows are described by Postal Service witness McCrery, on whose testimony and interrogatory responses we rely. See generally USPS-T-42, pp. 2-13; responses to GCA/USPS-T42-1 through -4..

¹¹ Mr. Taufique describes his procedure at USPS-T-32, pp. 22-24. He obtained processing and delivery costs by shape from witnesses Smith (USPS-T-13) and Kelley (USPS-T-30), respectively.

¹² See response to OCA/USPS-T42-4(a).

¹³ According to witness Kelley (response to GCA/USPS-T30-1). The cost figures cited in the next sentence also come from Mr. Kelley (see USPS-T-30, pp. 3-5, particularly Table 1), and were used by Mr. Taufique in developing his rate proposal.

1 accurately¹⁴, it would appear that charging low-aspect-ratio letters the Flats rate
2 would create a significantly heterogeneous rate category, and one not based on
3 a true alignment of pieces with their characteristic unit costs.

4 In light of the results of this experiment and considering the strong cultural and
5 aesthetic value these types of mail pieces possess as set forth in Witness Liss'
6 testimony, the Greeting Card Association urges the Commission to modify the
7 Postal Service's proposed rate structure for single piece First Class mail by
8 maintaining the non-standard surcharge for mail pieces such as square cards
9 that, while entailing some greater need for manual cancellation (and perhaps an
10 immaterial amount of additional manual sorting), display a much higher degree of
11 machinability than flats, are processed on letter-mail equipment, and are
12 delivered as letters. The proposed rate structure, which is meant to be cost-
13 based, is in fact too broad. By oversimplifying the relation between shape and
14 machinability, it ignores significant differences between low aspect ratio letter-
15 sized envelopes and flats. The same rate treatment for these two very different
16 types of mail pieces should not be approved. Instead, the Commission should
17 recommend a refined version of the Postal Service proposal, in which –

18 (1) the different single-piece first-ounce rates for Letters, Flats, and Parcels are
19 retained, but

20 (2) Letters which would be subject to the existing non-machinable surcharge only
21 because of low aspect ratio would continue to pay that surcharge, rather than
22 being assimilated to Flats for rate purposes.

23 Thus – using the Service's proposed rates for purposes of illustration – a one-
24 ounce machinable letter would pay 42 cents, a one-ounce low-aspect-ratio letter
25 would pay 55 cents¹⁵, a one-ounce Letter failing to meet any other machinability
26 standard or a one-ounce Flat would pay 62 cents, and a one-ounce Parcel \$1.00.

¹⁴ USPS-T-32, pp. 3-4, 17-19, 22-24.

¹⁵ \$0.42 + \$0.13 surcharge = \$0.55.

- 1 Suggested changes to the Domestic Mail Classification Schedule to embody this
- 2 rate design are attached to my testimony as Exh. GCA-T-3C.

APPENDIX A

Rocky Mountains:

Tom Trumble
Leanin' Tree
6055 Longbow Drive
Boulder, CO 80301

West Coast:

Sara Gilchrist-Wells
Meri Meri
525 Harbor Boulevard
Belmont, CA 94003

Upper Midwest:

Doug Faust
Masterpiece Studios/Hortense B. Hewitt
2080 Lookout Drive
North Mankato, MN 56002

Great Lakes:

Steve Laserson
American Greetings
One American Road
Cleveland, OH 44144

Mid-Atlantic:

Marianne McDermott
Consultant
3308 Brandy Court
Falls Church, VA 22042

Midwest:

Barbara Koirtyohann
Hallmark Cards, Inc.
2501 McGee Street
Kansas City, MO 64141

Northeast/New England:

Hamilton Davison
Paramount Cards Inc.
400 Pine Street
Pawtucket, RI 02860

Southwest:

Angie Hale

8641 London Heights

San Antonio, TX 78254

Exhibit A

SET Mailer Declarations

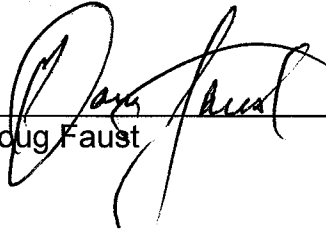
Postal Rate and Fee Changes, 2006

DECLARATION OF MR. DOUG FAUST

- 1

Further the affiant sayeth not.

In accordance with 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct. Executed on July 18 2006.



Doug Faust

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001**

Postal Rate and Fee Changes, 2006

Docket No. R2006-1

DECLARATION OF MS. SARAH GILCHRIST

1. My name is Sarah Gilchrist, and I am above 18 years of age. I make this declaration in support of the Greeting Card Association and its Square Envelope Test ("SET"). I agreed to participate in the SET.
2. GCA provided me two sets of sealed envelopes. I inspected the two sets of envelopes. The first set contained 63 square shaped envelopes numbered SGS001 through SGS063. The second set contained 63 rectangular shaped envelopes numbered SGR001 through SGR063.
3. Each square envelope came sealed, had an affixed printed address label, an affixed printed return address label, an identifying number on the envelope (e.g., SGS001), and 52 cents of affixed postage in the form of adhesive stamps. Each rectangular envelope came sealed, had an affixed printed address label, an affixed printed return address label, an identifying number on the envelope (e.g., SGR001), and 39 cents of affixed postage in the form of adhesive stamps. I could tell by feel that there was something in each envelope, and although I did not see the contents of the envelopes I am informed that each contained a square shaped, or rectangular shaped greeting card, respectively.
4. Every envelope was in good clean condition and there was no indication that any of these envelopes had been previously mailed (e.g., there was no postage or cancellation mark). Every envelope was addressed to Mr. Rafe Morrissey at the GCA in Washington, D.C.
5. I work at Meri Meri, located at 525 Harbor Boulevard, Belmont, California. On July 20, 2006, I mailed all of the 126 test envelopes to Mr. Morrissey by leaving them for postal carrier pickup in Belmont.

Further the affiant sayeth not.

In accordance with 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct. Executed on 7/20/06 2006.


Sarah Gilchrist

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001**

Postal Rate and Fee Changes, 2006

Docket No. R2006-1

DECLARATION OF MS. ANGIE HALE

1. My name is Angie Hale, and I am above 18 years of age. I make this declaration in support of the Greeting Card Association and its Square Envelope Test ("SET"). I agreed to participate in the SET.
2. GCA provided me two sets of sealed envelopes. I inspected the two sets of envelopes. The first set contained 63 square shaped envelopes numbered AHS001 through AHS063. The second set contained 63 rectangular shaped envelopes numbered AHR001 through AHR063.
3. Each square envelope came sealed, had an affixed printed address label, an affixed printed return address label, an identifying number on the envelope (e.g., AHS001), and 52 cents of affixed postage in the form of adhesive stamps. Each rectangular envelope came sealed, had an affixed printed address label, an affixed printed return address label, an identifying number on the envelope (e.g., AHR001), and 39 cents of affixed postage in the form of adhesive stamps. I could tell by feel that there was something in each envelope, and although I did not see the contents of the envelopes I am informed that each contained a square shaped, or rectangular shaped greeting card, respectively.
4. Every envelope was in good clean condition and there was no indication that any of these envelopes had been previously mailed (e.g., there was no postage or cancellation mark). Every envelope was addressed to Mr. Rafe Morrissey at the GCA in Washington, D.C.
5. I reside at 8641 London Heights, San Antonio, Texas. On July 20, 2006, I mailed all of the 126 test envelopes to Mr. Morrissey by placing them in a mailbox in San Antonio.

Further the affiant sayeth not.

In accordance with 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct. Executed on July 26 2006.

Angie Hale
Angie Hale

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001**

Postal Rate and Fee Changes, 2006

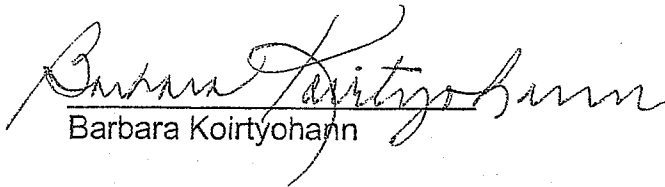
Docket No. R2006-1

DECLARATION OF MS. BARBARA KOIRTYOHANN

1. My name is Barbara Koirtyohann, and I am above 18 years of age. I make this declaration in support of the Greeting Card Association and its Square Envelope Test ("SET"). I agreed to participate in the SET.
2. GCA provided me two sets of sealed envelopes. I inspected the two sets of envelopes. The first set contained 63 square shaped envelopes numbered BKS001 through BKS063. The second set contained 63 rectangular shaped envelopes numbered BKR001 through BKR063.
3. Each square envelope came sealed, had an affixed printed address label, an affixed printed return address label, an identifying number on the envelope (e.g., BKS001), and 52 cents of affixed postage in the form of adhesive stamps. Each rectangular envelope came sealed, had an affixed printed address label, an affixed printed return address label, an identifying number on the envelope (e.g., BKR001), and 39 cents of affixed postage in the form of adhesive stamps. I could tell by feel that there was something in each envelope, and although I did not see the contents of the envelopes I am informed that each contained a square shaped, or rectangular shaped greeting card, respectively.
4. Every envelope was in good clean condition and there was no indication that any of these envelopes had been previously mailed (e.g., there was no postage or cancellation mark). Every envelope was addressed to Mr. Rafe Morrissey at the GCA in Washington, D.C.
5. I work at Hallmark Cards, Inc., located at 2501 McGee Street, Kansas City, Missouri. On July 20, 2006, I mailed all of the 126 test envelopes to Mr. Morrissey by leaving them for office mail pickup at Hallmark Cards in Kansas City.

Further the affiant sayeth not.

In accordance with 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct. Executed on July 31, 2006.


Barbara Koirtyohann

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001**

Postal Rate and Fee Changes, 2006

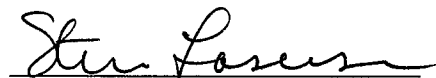
Docket No. R2006-1

DECLARATION OF MR. STEVE LASERSON

1. My name is Steve Laserson, and I am above 18 years of age. I make this declaration in support of the Greeting Card Association and its Square Envelope Test ("SET"). I agreed to participate in the SET.
2. GCA provided me two sets of sealed envelopes. I inspected the two sets of envelopes. The first set contained 63 square shaped envelopes numbered SLS001 through SLS063. The second set contained 63 rectangular shaped envelopes numbered SLR001 through SLR063.
3. Each square envelope came sealed, had an affixed printed address label, an affixed printed return address label, an identifying number on the envelope (e.g., SLS001), and 52 cents of affixed postage in the form of adhesive stamps. Each rectangular envelope came sealed, had an affixed printed address label, an affixed printed return address label, an identifying number on the envelope (e.g., SLR001), and 39 cents of affixed postage in the form of adhesive stamps. I could tell by feel that there was something in each envelope, and although I did not see the contents of the envelopes I am informed that each contained a square shaped, or rectangular shaped greeting card, respectively.
4. Every envelope was in good clean condition and there was no indication that any of these envelopes had been previously mailed (e.g., there was no postage or cancellation mark). Every envelope was addressed to Mr. Rafe Morrissey at the GCA in Washington, D.C.
5. I work at American Greetings Corporation, located at One American Road, Cleveland, Ohio. On July 20, 2006, I mailed all of the 126 test envelopes to Mr. Morrissey at a Post Office in Cleveland.

Further the affiant sayeth not.

In accordance with 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct. Executed on July 27, 2006.


Steve Laserson

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001**

Postal Rate and Fee Changes, 2006

Docket No. R2006-1

DECLARATION OF MS. MARIANNE McDERMOTT

1. My name is Marianne McDermott, and I am above 18 years of age. I make this declaration in support of the Greeting Card Association and its Square Envelope Test ("SET"). I agreed to participate in the SET.
2. GCA provided me two sets of sealed envelopes. I inspected the two sets of envelopes. The first set contained 63 square shaped envelopes numbered MMDS001 through MMDS063. The second set contained 63 rectangular shaped envelopes numbered MMDR001 through MMDR063.
3. Each square envelope came sealed, had an affixed printed address label, an affixed printed return address label, an identifying number on the envelope (e.g., MMDS001), and 52 cents of affixed postage in the form of adhesive stamps. Each rectangular envelope came sealed, had an affixed printed address label, an affixed printed return address label, an identifying number on the envelope (e.g., MMDR001), and 39 cents of affixed postage in the form of adhesive stamps. I could tell by feel that there was something in each envelope, and although I did not see the contents of the envelopes I am informed that each contained a square shaped, or rectangular shaped greeting card, respectively.
4. Every envelope was in good clean condition and there was no indication that any of these envelopes had been previously mailed (e.g., there was no postage or cancellation mark). Every envelope was addressed to Mr. Rafe Morrissey at the GCA in Washington, D.C.
5. I reside at 3308 Brandy Court, Falls Church, Virginia. On July 20, 2006, I mailed all of the 126 test envelopes to Mr. Morrissey at a Post Office in Falls Church.

Further the affiant sayeth not.

In accordance with 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct. Executed on July 27, 2006.

A handwritten signature in cursive script, appearing to read "Marianne McDermott", written over a horizontal line.

Marianne McDermott

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001**

Postal Rate and Fee Changes, 2006

Docket No. R2006-1

DECLARATION OF MR. TOM TRUMBLE

1. My name is Tom Trumble, and I am above 18 years of age. I make this declaration in support of the Greeting Card Association and its Square Envelope Test ("SET"). I agreed to participate in the SET.
2. GCA provided me two sets of sealed envelopes. I inspected the two sets of envelopes. The first set contained 63 square shaped envelopes numbered TTS001 through TTS063. The second set contained 63 rectangular shaped envelopes numbered TTR001 through TTR063.
3. Each square envelope came sealed, had an affixed printed address label, an affixed printed return address label, an identifying number on the envelope (e.g., TTS001), and 52 cents of affixed postage in the form of adhesive stamps. Each rectangular envelope came sealed, had an affixed printed address label, an affixed printed return address label, an identifying number on the envelope (e.g., TTR001), and 39 cents of affixed postage in the form of adhesive stamps. I could tell by feel that there was something in each envelope, and although I did not see the contents of the envelopes I am informed that each contained a square shaped, or rectangular shaped greeting card, respectively.
4. Every envelope was in good clean condition and there was no indication that any of these envelopes had been previously mailed (e.g., there was no postage or cancellation mark). Every envelope was addressed to Mr. Rafe Morrissey at the GCA in Washington, D.C.
5. I work at Leanin' Tree, Inc. located at 6055 Longbow Drive, Boulder, Colorado. On July 20, 2006, I mailed all of the 126 test envelopes to Mr. Morrissey by depositing them in the Leanin' Tree mailroom in Boulder.

Further the affiant sayeth not.

In accordance with 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct. Executed on July 25 2006.


Tom Trumble

Exhibit B

Square Envelope Test Log

Greeting Card Association Square Envelope Test - Combined Results - DRAFT

Total Cards Sent

Square	504
Rectangular	504

Total Cards Received

Square	504
Rectangular	504

Square Card Summary

	Total	% of Sample
F/C Processed	355	70.44
Manually Cancelled	69	13.69
No Cancellation	80	15.87
Machine Processed	480	95.24
I.D. Tag	430	85.32
Bar Code	423	83.93
Manually Processed	24	4.76

Rectangular Card Summary

	Total	% of Sample
F/C Processed	405	80.36
Manually Cancelled	3	0.60
No Cancellation	96	19.05
Machine Processed	504	100.00
I.D. Tag	499	99.01
Bar Code	438	86.90
Manually Processed	0	0.00

Greeting Card Association Square Envelope Test Log

Sarah Gilchrist-Wells - West Coast Region			Address: Meri Meri 525 Harbor Boulevard Belmont, CA 94002		E-Mail: sgilchrist@merimeri.com			
Date Rec'd:	7/18/2006	Method Sent:	Postal Carrier	Date Mailed:	7/20/2006	Declaration Rec'd		
Envelope Serial Number	Date Rec'd	F/C Processed	Manually Cancelled	No Cancellation	Machine Processed	I.D. Tag	Bar Code	Manually Processed
SGWS001	7/24/2006			1		1		1
SGWS002	7/24/2006			1		1		1
SGWS003	7/24/2006			1		1		1
SGWS004	7/24/2006			1		1		1
SGWS005	7/24/2006	1				1	1	1
SGWS006	7/24/2006			1		1		1
SGWS007	7/24/2006	1				1	1	1
SGWS008	7/24/2006			1		1		1
SGWS009	7/24/2006			1		1		1
SGWS010	7/24/2006	1				1	1	1
SGWS011	7/24/2006			1		1		1
SGWS012	7/24/2006			1		1		1
SGWS013	7/24/2006			1		1		1
SGWS014	7/24/2006			1		1		1
SGWS015	7/24/2006	1				1	1	1
SGWS016	7/24/2006	1				1	1	1
SGWS017	7/24/2006			1		1		1
SGWS018	7/24/2006	1				1	1	1
SGWS019	7/24/2006			1		1		1
SGWS020	7/24/2006			1		1		1
SGWS021	7/24/2006	1				1	1	1
SGWS022	7/24/2006			1		1		1
SGWS023	7/24/2006			1		1		1
SGWS024	7/24/2006			1		1		1
SGWS025	7/24/2006			1		1		1
SGWS026	7/24/2006	1				1	1	1
SGWS027	7/24/2006	1				1	1	1
SGWS028	7/24/2006	1				1	1	1
SGWS029	7/24/2006	1				1	1	1
SGWS030	7/24/2006			1		1		1
SGWS031	7/24/2006	1				1	1	1
SGWS032	7/24/2006			1		1		1
SGWS033	7/24/2006	1				1	1	1
SGWS034	7/24/2006			1		1		1
SGWS035	7/24/2006	1				1	1	1
SGWS036	7/24/2006			1		1		1
SGWS037	7/24/2006	1				1	1	1
SGWS038	7/24/2006	1				1	1	1
SGWS039	7/24/2006			1		1		1
SGWS040	7/24/2006	1				1	1	1
SGWS041	7/24/2006	1				1	1	1
SGWS042	7/24/2006			1		1		1
SGWS043	7/24/2006			1		1		1
SGWS044	7/24/2006	1				1	1	1
SGWS045	7/24/2006	1				1	1	1
SGWS046	7/24/2006			1		1		1
SGWS047	7/24/2006			1		1		1
SGWS048	7/24/2006			1		1		1
SGWS049	7/24/2006	1				1	1	1
SGWS050	7/24/2006	1				1	1	1
SGWS051	7/24/2006	1				1	1	1
SGWS052	7/24/2006			1		1		1
SGWS053	7/24/2006	1				1	1	1
SGWS054	7/24/2006			1		1		1
SGWS055	7/24/2006	1				1	1	1
SGWS056	7/24/2006			1		1		1
SGWS057	7/24/2006			1		1		1
SGWS058	7/24/2006			1		1		1
SGWS059	7/24/2006	1				1	1	1
SGWS060	7/24/2006			1		1		

Cancellation on back of envelope

SGWR001	7/24/2006	1				1	1	1
SGWR002	7/24/2006	1				1	1	1
SGWR003	7/24/2006	1				1	1	1
SGWR004	7/24/2006	1				1	1	1
SGWR005	7/24/2006	1	1			1	1	1
SGWR006	7/24/2006	1				1	1	1
SGWR007	7/24/2006	1				1	1	1
SGWR008	7/24/2006	1				1	1	1
SGWR009	7/24/2006	1				1	1	1
SGWR010	7/24/2006	1				1	1	1
SGWR011	7/24/2006	1				1	1	1
SGWR012	7/24/2006	1				1	1	1
SGWR013	7/24/2006	1				1	1	1
SGWR014	7/24/2006	1				1	1	1
SGWR015	7/24/2006	1				1	1	1
SGWR016	7/24/2006	1				1	1	1
SGWR017	7/24/2006	1				1	1	1
SGWR018	7/24/2006	1				1	1	1
SGWR019	7/24/2006	1				1	1	1
SGWR020	7/24/2006	1				1	1	1
SGWR021	7/24/2006	1				1	1	1
SGWR022	7/24/2006	1				1	1	1
SGWR023	7/24/2006	1				1	1	1
SGWR024	7/24/2006	1				1	1	1
SGWR025	7/24/2006	1				1	1	1
SGWR026	7/24/2006	1				1	1	1
SGWR027	7/24/2006	1				1	1	1
SGWR028	7/24/2006	1				1	1	1
SGWR029	7/24/2006	1				1	1	1
SGWR030	7/24/2006	1				1	1	1
SGWR031	7/24/2006	1				1	1	1
SGWR032	7/24/2006	1				1	1	1
SGWR033	7/24/2006	1				1	1	1
SGWR034	7/24/2006	1				1	1	1
SGWR035	7/24/2006	1				1	1	1
SGWR036	7/24/2006	1				1	1	1
SGWR037	7/24/2006	1				1	1	1
SGWR038	7/24/2006	1				1	1	1
SGWR039	7/24/2006	1				1	1	1
SGWR040	7/24/2006	1				1	1	1
SGWR041	7/24/2006	1	1			1	1	1
SGWR042	7/24/2006	1				1	1	1
SGWR043	7/24/2006	1				1	1	1
SGWR044	7/24/2006	1				1	1	1
SGWR045	7/24/2006	1				1	1	1
SGWR046	7/24/2006	1				1	1	1
SGWR047	7/24/2006	1	1			1	1	1
SGWR048	7/24/2006	1				1	1	1
SGWR049	7/24/2006	1				1	1	1
SGWR050	7/24/2006	1				1	1	1
SGWR051	7/24/2006	1				1	1	1
SGWR052	7/24/2006	1				1	1	1
SGWR053	7/24/2006	1				1	1	1
SGWR054	7/24/2006	1				1	1	1
SGWR055	7/24/2006	1				1	1	1
SGWR056	7/24/2006	1				1	1	1
SGWR057	7/24/2006	1				1	1	1
SGWR058	7/24/2006	1				1	1	1
SGWR059	7/24/2006	1				1	1	1
SGWR060	7/24/2006	1				1	1	1
SGWR061	7/24/2006	1				1	1	1
SGWR062	7/24/2006	1				1	1	1
SGWR063	7/24/2006	1						

Tom Trumble - Rocky Mountain Region		Address: Leanin' Tree 6055 Longbow Drive Boulder, CO 80301		E-mail: tom.trumble@leanintree.com	
Date Rec'd: 7/18/2006	Method Sent: Mail Room	Date Mailed: 7/20/2006	Declaration Rec'd		
Envelope Serial Number	Date Rec'd	F/C Processed	Manually Cancelled	No Cancellation	Machine Processed
TTS001	7/24/2006	1			1
TTS002	7/24/2006	1			1
TTS003	7/24/2006	1			1
TTS004	7/24/2006	1			1
TTS005	7/24/2006	1			1
TTS006	7/24/2006	1			1
TTS007	7/24/2006	1			1
TTS008	7/24/2006	1			1
TTS009	7/24/2006	1			1
TTS010	7/24/2006	1			1
TTS011	7/24/2006	1			1
TTS012	7/24/2006	1			1
TTS013	7/24/2006	1			1
TTS014	7/24/2006	1			1
TTS015	7/24/2006	1			1
TTS016	7/24/2006	1			1
TTS017	7/24/2006	1			1
TTS018	7/24/2006	1			1
TTS019	7/24/2006	1			1
TTS020	7/24/2006	1			1
TTS021	7/24/2006	1			1
TTS022	7/24/2006	1			1
TTS023	7/24/2006	1			1
TTS024	7/24/2006	1			1
TTS025	7/24/2006	1			1
TTS026	7/24/2006	1			1
TTS027	7/24/2006	1			1
TTS028	7/24/2006	1			1
TTS029	7/24/2006	1			1
TTS030	7/24/2006	1			1
TTS031	7/24/2006	1			1
TTS032	7/24/2006	1			1
TTS033	7/24/2006	1			1
TTS034	7/24/2006	1			1
TTS035	7/24/2006	1			1
TTS036	7/24/2006	1			1
TTS037	7/24/2006	1			1
TTS038	7/24/2006	1			1
TTS039	7/24/2006	1			1
TTS040	7/24/2006	1			1
TTS041	7/24/2006	1			1
TTS042	7/24/2006	1			1
TTS043	7/24/2006	1			1
TTS044	7/24/2006	1			1
TTS045	7/24/2006	1			1
TTS046	7/24/2006	1			1
TTS047	7/24/2006	1			1
TTS048	7/24/2006	1			1
TTS049	7/24/2006	1			1
TTS050	7/24/2006	1			1
TTS051	7/24/2006	1			1
TTS052	7/24/2006	1			1
TTS053	7/24/2006	1			1
TTS054	7/24/2006	1			1
TTS055	7/24/2006	1			1
TTS056	7/24/2006	1			1
TTS057	7/24/2006	1			1
TTS058	7/24/2006	1			1
TTS059	7/24/2006	1			1
TTS060	7/24/2006	1			1
TTS061	7/24/2006	1			1
TTS062	7/24/2006	1			1
TTS063	7/24/2006	1			1
Total		0	0	0	63
% of Test Group		0	0	0	100
TTR001	7/24/2006	1			1
TTR002	7/24/2006	1			1
TTR003	7/24/2006	1			1
TTR004	7/24/2006	1			1
TTR005	7/24/2006	1			1
TTR006	7/24/2006	1			1
TTR007	7/24/2006	1			1
TTR008	7/24/2006	1			1
TTR009	7/24/2006	1			1
TTR010	7/24/2006	1			1
TTR011	7/24/2006	1			1
TTR012	7/24/2006	1			1
TTR013	7/24/2006	1			1
TTR014	7/24/2006	1			1
TTR015	7/24/2006	1			1
TTR016	7/24/2006	1			1
TTR017	7/24/2006	1			1
TTR018	7/24/2006	1			1
TTR019	7/24/2006	1			1
TTR020	7/24/2006	1			1
TTR021	7/24/2006	1			1
TTR022	7/24/2006	1			1
TTR023	7/24/2006	1			1
TTR024	7/24/2006	1			1
TTR025	7/24/2006	1			1
TTR026	7/24/2006	1			1
TTR027	7/24/2006	1			1
TTR028	7/24/2006	1			1
TTR029	7/24/2006	1			1
TTR030	7/24/2006	1			1
TTR031	7/24/2006	1			1
TTR032	7/24/2006	1			1
TTR033	7/24/2006	1			1
TTR034	7/24/2006	1			1
TTR035	7/24/2006	1			1
TTR036	7/24/2006	1			1
TTR037	7/24/2006	1			1
TTR038	7/24/2006	1			1
TTR039	7/24/2006	1			1
TTR040	7/24/2006	1			1
TTR041	7/24/2006	1			1
TTR042	7/24/2006	1			1
TTR043	7/24/2006	1			1
TTR044	7/24/2006	1			1
TTR045	7/24/2006	1			1
TTR046	7/24/2006	1			1
TTR047	7/24/2006	1			1
TTR048	7/24/2006	1			1
TTR049	7/24/2006	1			1
TTR050	7/24/2006	1			1
TTR051	7/24/2006	1			1
TTR052	7/24/2006	1			1
TTR053	7/24/2006	1			1
TTR054	7/24/2006	1			1
TTR055	7/24/2006	1			1
TTR056	7/24/2006	1			1
TTR057	7/24/2006	1			1
TTR058	7/24/2006	1			1
TTR059	7/24/2006	1			1
TTR060	7/24/2006	1			1
TTR061	7/24/2006	1			1
TTR062	7/24/2006	1			1
TTR063	7/24/2006	1			1
Total		0	0	0	63
% of Test Group		0	0	0	100

Doug Faust - Upper Midwest Region		Address: Masterpiece Studios 2080 Lookout Drive North Mankato, MN 56002				E-mail: dafaust@masterpiecestudios.com		
Date Rec'd: 7/18/2006 Method Sent:		Date Mailed: 7/20/2006		Declaration Rec'd				
Envelope Serial Number	Office Pickup Date Rec'd	F/C Processed	Manually Cancelled	No Cancellation	Machine Processed	I.D. Tag	Bar Code	Manually Processed
DFS001	7/24/2006	1			1	1	1	
DFS002	7/24/2006	1			1	1	1	
DFS003	7/24/2006		1		1	1		I.D. Tag on Front
DFS004	7/24/2006	1			1	1	1	
DFS005	7/24/2006		1		1	1	1	
DFS006	7/24/2006	1			1	1	1	
DFS007	7/24/2006		1		1	1	1	
DFS008	7/24/2006	1			1	1	1	
DFS009	7/24/2006	1			1	1	1	
DFS010	7/24/2006	1			1	1	1	
DFS011	7/24/2006	1			1	1	1	
DFS012	7/24/2006	1			1	1	1	
DFS013	7/24/2006	1			1	1	1	
DFS014	7/24/2006		1		1	1	1	
DFS015	7/24/2006	1			1	1	1	
DFS016	7/24/2006	1			1	1	1	
DFS017	7/24/2006		1		1	1	1	
DFS018	7/24/2006	1			1	1	1	
DFS019	7/24/2006	1			1	1	1	
DFS020	7/24/2006		1		1	1	1	
DFS021	7/24/2006	1			1	1	1	
DFS022	7/24/2006		1		1	1	1	
DFS023	7/24/2006		1		1	1	1	
DFS024	7/24/2006	1			1	1	1	
DFS025	7/24/2006		1		1	1	1	
DFS026	7/24/2006		1		1	1	1	
DFS027	7/24/2006	1			1	1	1	
DFS028	7/24/2006	1			1	1	1	
DFS029	7/24/2006	1			1	1	1	
DFS030	7/24/2006	1			1	1	1	
DFS031	7/24/2006	1			1	1	1	
DFS032	7/24/2006	1			1	1	1	
DFS033	7/24/2006	1			1	1	1	
DFS034	7/24/2006	1			1	1	1	
DFS035	7/24/2006		1		1	1	1	
DFS036	7/24/2006	1			1	1	1	
DFS037	7/24/2006	1			1	1	1	
DFS038	7/24/2006	1			1	1		
DFS039	7/24/2006	1			1	1	1	
DFS040	7/24/2006	1			1	1	1	
DFS041	7/24/2006	1			1	1	1	
DFS042	7/24/2006	1			1	1	1	
DFS043	7/24/2006	1			1	1	1	
DFS044	7/24/2006	1			1	1	1	
DFS045	7/24/2006	1			1	1	1	
DFS046	7/24/2006	1			1	1	1	
DFS047	7/24/2006	1			1	1	1	
DFS048	7/24/2006	1			1	1	1	
DFS049	7/24/2006	1			1	1	1	
DFS050	7/24/2006	1			1	1	1	
DFS051	7/24/2006	1			1	1	1	
DFS052	7/24/2006		1		1	1	1	
DFS053	7/24/2006	1			1	1	1	
DFS054	7/24/2006	1			1	1	1	
DFS055	7/24/2006	1			1	1	1	
DFS056	7/24/2006	1			1	1	1	
DFS057	7/24/2006	1			1	1	1	
DFS058	7/24/2006	1			1	1	1	
DFS059	7/24/2006	1			1	1	1	
DFS060	7/24/2006	1			1	1	1	
DFS061	7/24/2006	1			1	1	1	
DFS062	7/24/2006	1			1	1	1	
DFS063	7/24/2006	1			1	1	1	
Total		Total	Total	Total	Total	Total	Total	Total
		51	12	0	63	63	60	0
% of Test Group		80.95238095	19.04761905	0	100	100	95.2381	0

Doug Faust - Upper Midwest Region
Date Rec'd: 7/18/2006 Method Sent: Office Pickup
Envelope Serial Number

Address: Masterpiece Studios 2080 Lookout Drive North Mankato, MN 56002
Date Mailed: 7/20/2006 Declaration Rec'd
F/C Processed Manually Cancelled No Cancellation

E-mail: dafaust@masterpiecestudios.com
Machine Processed I.D. Tag Bar Code Manually Processed

DFR001	7/24/2006				1	1	1	1
DFR002	7/24/2006				1	1	1	1
DFR003	7/24/2006				1	1	1	1
DFR004	7/24/2006				1	1	1	1
DFR005	7/24/2006				1	1	1	1
DFR006	7/24/2006				1	1	1	1
DFR007	7/24/2006				1	1	1	1
DFR008	7/24/2006				1	1	1	1
DFR009	7/24/2006				1	1	1	1
DFR010	7/24/2006				1	1	1	1
DFR011	7/24/2006				1	1	1	1
DFR012	7/24/2006				1	1	1	1
DFR013	7/24/2006				1	1	1	1
DFR014	7/24/2006				1	1	1	1
DFR015	7/24/2006				1	1	1	1
DFR016	7/24/2006				1	1	1	1
DFR017	7/24/2006				1	1	1	1
DFR018	7/24/2006				1	1	1	1
DFR019	7/24/2006				1	1	1	1
DFR020	7/24/2006				1	1	1	1
DFR021	7/24/2006				1	1	1	1
DFR022	7/24/2006				1	1	1	1
DFR023	7/24/2006				1	1	1	1
DFR024	7/24/2006				1	1	1	1
DFR025	7/24/2006				1	1	1	1
DFR026	7/24/2006				1	1	1	1
DFR027	7/24/2006				1	1	1	1
DFR028	7/24/2006				1	1	1	1
DFR029	7/24/2006				1	1	1	1
DFR030	7/24/2006				1	1	1	1
DFR031	7/24/2006				1	1	1	1
DFR032	7/24/2006	1				1	1	1
DFR033	7/24/2006	1				1	1	1
DFR034	7/24/2006	1				1	1	1
DFR035	7/24/2006	1				1	1	1
DFR036	7/24/2006	1				1	1	1
DFR037	7/24/2006	1				1	1	1
DFR038	7/24/2006	1				1	1	1
DFR039	7/24/2006	1				1	1	1
DFR040	7/24/2006	1				1	1	1
DFR041	7/24/2006	1				1	1	1
DFR042	7/24/2006	1				1	1	1
DFR043	7/24/2006	1				1	1	1
DFR044	7/24/2006	1				1	1	1
DFR045	7/24/2006	1				1	1	1
DFR046	7/24/2006	1				1	1	1
DFR047	7/24/2006	1				1	1	1
DFR048	7/24/2006	1				1	1	1
DFR049	7/24/2006	1				1	1	1
DFR050	7/24/2006	1				1	1	1
DFR051	7/24/2006	1				1	1	1
DFR052	7/24/2006	1				1	1	1
DFR053	7/24/2006	1				1	1	1
DFR054	7/24/2006	1				1	1	1
DFR055	7/24/2006	1				1	1	1
DFR056	7/24/2006	1				1	1	1
DFR057	7/24/2006	1				1	1	1
DFR058	7/24/2006	1				1	1	1
DFR059	7/24/2006	1				1	1	1
DFR060	7/24/2006	1				1	1	1
DFR061	7/24/2006	1				1	1	1
DFR062	7/24/2006	1				1	1	1
DFR063	7/24/2006	1				1	1	1
Total		Total	Total		Total	Total	Total	Total
		32	0		31	63	63	63
% of Test Group		50.79365079	0		49.20634921	100	100	100
								0
								0

Barbara Koirttyohann - Midwest-Region Address: Hallmark Cards, Inc. 2501 McGee, Mail Drop #288 Kansas City, MO 64141 E-Mail: bkoirt2@hallmark.com

Date Rec'd: 7/18/2006 Method Sent: Office Mail Pickup Date Mailed: 7/20/2006 Declaration Rec'd

Envelope Serial Number	Date Rec'd	F/C Processed	Manually Cancelled	No Cancellation	Machine Processed	I.D. Tag	Bar Code	Manually Processed
BKS001	7/24/2006		1		1	1	1	
BKS002	7/24/2006	1			1	1	1	
BKS003	7/24/2006	1			1	1	1	
BKS004	7/24/2006		1		1	1	1	
BKS005	7/24/2006	1			1	1	1	
BKS006	7/24/2006	1			1	1	1	
BKS007	7/24/2006		1		1	1		Cancelled on Side
BKS008	7/24/2006	1			1	1	1	
BKS009	7/24/2006	1			1	1	1	
BKS010	7/24/2006	1			1	1	1	
BKS011	7/24/2006	1			1	1	1	
BKS012	7/24/2006	1			1	1	1	
BKS013	7/24/2006	1			1	1	1	
BKS014	7/24/2006	1			1	1	1	
BKS015	7/24/2006	1			1	1	1	
BKS016	7/24/2006	1			1	1		
BKS017	7/24/2006		1					1
BKS018	7/24/2006	1			1	1	1	
BKS019	7/24/2006	1			1	1	1	
BKS020	7/24/2006	1			1	1	1	
BKS021	7/24/2006	1			1	1	1	
BKS022	7/24/2006	1			1	1	1	
BKS023	7/24/2006		1					1
BKS024	7/24/2006	1			1	1	1	
BKS025	7/24/2006	1			1	1	1	
BKS026	7/24/2006	1			1	1	1	
BKS027	7/24/2006		1		1	1	1	
BKS028	7/24/2006	1			1	1	1	
BKS029	7/24/2006	1			1	1	1	
BKS030	7/24/2006	1			1	1	1	
BKS031	7/24/2006	1			1	1	1	
BKS032	7/24/2006		1		1	1	1	
BKS033	7/24/2006	1			1	1		Cancelled on side
BKS034	7/24/2006	1			1	1	1	
BKS035	7/24/2006	1			1	1	1	
BKS036	7/24/2006	1			1	1	1	
BKS037	7/24/2006	1			1	1	1	
BKS038	7/24/2006	1			1	1	1	
BKS039	7/24/2006	1			1	1	1	
BKS040	7/24/2006	1			1	1	1	
BKS041	7/24/2006	1			1	1	1	
BKS042	7/24/2006	1			1	1	1	
BKS043	7/24/2006	1			1	1	1	
BKS044	7/24/2006	1			1	1	1	
BKS045	7/24/2006	1			1	1	1	
BKS046	7/24/2006		1					1
BKS047	7/24/2006	1			1	1	1	
BKS048	7/24/2006	1			1	1	1	
BKS049	7/24/2006	1			1	1	1	
BKS050	7/24/2006	1			1	1	1	
BKS051	7/24/2006	1			1	1	1	
BKS052	7/24/2006	1			1	1		
BKS053	7/24/2006	1			1	1	1	
BKS054	7/24/2006	1			1	1	1	
BKS055	7/24/2006	1			1	1	1	
BKS056	7/24/2006		1					1
BKS057	7/24/2006	1			1	1	1	
BKS058	7/24/2006	1			1	1	1	
BKS059	7/24/2006		1					1
BKS060	7/24/2006	1			1	1	1	
BKS061	7/24/2006	1			1	1	1	
BKS062	7/24/2006		1					1
BKS063	7/24/2006		1					1
Total		51	Total	12	Total	56	Total	52
% of Test Group		80.95238095	19.04761905		0	88.88888889	88.88889	82.53968
					0			11.11111111
					7			

Envelope Serial Number	Date Rec'd	F/C Processed	Manually Cancelled	No Cancellation	Machine Processed	I.D. Tag	Bar Code	Manually Processed
BKR001	7/24/2006	1			1	1	1	
BKR002	7/24/2006	1			1	1	1	
BKR003	7/24/2006	1			1	1	1	
BKR004	7/24/2006	1			1	1	1	
BKR005	7/24/2006	1			1	1	1	
BKR006	7/24/2006	1			1	1	1	
BKR007	7/24/2006	1			1	1	1	
BKR008	7/24/2006	1			1	1	1	
BKR009	7/24/2006	1			1	1	1	
BKR010	7/24/2006	1			1	1	1	
BKR011	7/24/2006	1			1	1	1	
BKR012	7/24/2006	1			1	1	1	
BKR013	7/24/2006	1			1	1	1	
BKR014	7/24/2006	1			1	1	1	
BKR015	7/24/2006	1			1	1	1	
BKR016	7/24/2006	1			1	1	1	
BKR017	7/24/2006	1			1	1	1	
BKR018	7/24/2006	1			1	1	1	
BKR019	7/24/2006	1			1	1	1	
BKR020	7/24/2006	1			1	1	1	
BKR021	7/24/2006	1			1	1	1	
BKR022	7/24/2006	1			1	1		
BKR023	7/24/2006	1			1	1		1
BKR024	7/24/2006	1			1	1		1
BKR025	7/24/2006	1			1	1		1
BKR026	7/24/2006	1			1	1		1
BKR027	7/24/2006	1			1	1		1
BKR028	7/24/2006	1			1	1		1
BKR029	7/24/2006	1			1	1		1
BKR030	7/24/2006	1			1	1		1
BKR031	7/24/2006	1			1	1		1
BKR032	7/24/2006	1			1	1		1
BKR033	7/24/2006	1			1	1		1
BKR034	7/24/2006	1			1	1		1
BKR035	7/24/2006	1			1	1		1
BKR036	7/24/2006	1			1	1		1
BKR037	7/24/2006	1			1	1		1
BKR038	7/24/2006	1			1	1		1
BKR039	7/24/2006	1			1	1		1
BKR040	7/24/2006	1			1	1		1
BKR041	7/24/2006	1			1	1		1
BKR042	7/24/2006	1			1	1		1
BKR043	7/24/2006	1			1	1		1
BKR044	7/24/2006	1			1	1		1
BKR045	7/24/2006	1			1	1		1
BKR046	7/24/2006	1			1	1		1
BKR047	7/24/2006	1			1	1		1
BKR048	7/24/2006	1			1	1		1
BKR049	7/24/2006	1			1	1		1
BKR050	7/24/2006	1			1	1		1
BKR051	7/24/2006	1			1	1		
BKR052	7/24/2006	1			1	1		1
BKR053	7/24/2006	1			1	1		1
BKR054	7/24/2006	1			1	1		1
BKR055	7/24/2006	1			1	1		1
BKR056	7/24/2006	1			1	1		1
BKR057	7/24/2006	1			1	1		1
BKR058	7/24/2006	1			1	1		1
BKR059	7/24/2006	1			1	1		1
BKR060	7/24/2006	1			1	1		1
BKR061	7/24/2006	1			1	1		1
BKR062	7/24/2006	1			1	1		
BKR063	7/24/2006	1			1	1		1
Total		Total	Total	Total	Total	Total	Total	Total
		63	0	0	63	63	60	0
% of Test Group		100	0	0	100	100	95.2381	0

Angie Hale - Southwest Region		Address: 8641 London Heights San Antonio, TX 78254		E-mail: angie.hale@usaa.com				
Date Rec'd: 7/18/2006 Method Sent: Mailbox		Date Mailed: 7/20/2006 Declaration Rec'd						
Envelope Serial Number	Date Rec'd	F/C Processed	Manually Cancelled	No Cancellation	Machine Processed	I.D. Tag	Bar Code	Manually Processed
AHS001	7/24/2006	1			1	1	1	
AHS002	7/24/2006	1			1	1	1	
AHS003	7/24/2006	1			1	1	1	
AHS004	7/24/2006	1			1	1	1	
AHS005	7/24/2006	1			1	1	1	
AHS006	7/24/2006	1			1	1	1	
AHS007	7/24/2006	1			1	1	1	
AHS008	7/24/2006	1			1	1	1	
AHS009	7/24/2006	1			1	1	1	
AHS010	7/24/2006	1			1	1	1	
AHS011	7/24/2006	1			1	1	1	
AHS012	7/24/2006	1			1	1	1	
AHS013	7/24/2006	1			1	1	1	
AHS014	7/24/2006	1			1	1	1	
AHS015	7/24/2006	1			1	1	1	
AHS016	7/24/2006	1			1	1	1	
AHS017	7/24/2006	1			1	1	1	
AHS018	7/24/2006	1			1	1	1	
AHS019	7/24/2006	1			1	1	1	
AHS020	7/24/2006	1			1	1	1	
AHS021	7/24/2006	1			1	1	1	
AHS022	7/24/2006	1			1	1	1	
AHS023	7/24/2006	1			1	1	1	
AHS024	7/24/2006	1			1	1	1	Cancelled on Side
AHS025	7/24/2006	1			1	1	1	
AHS026	7/24/2006	1			1	1	1	
AHS027	7/24/2006	1			1	1	1	
AHS028	7/24/2006	1			1	1	1	
AHS029	7/24/2006	1			1	1	1	
AHS030	7/24/2006	1			1	1	1	
AHS031	7/24/2006	1			1	1	1	
AHS032	7/24/2006	1			1	1	1	
AHS033	7/24/2006	1			1	1	1	
AHS034	7/24/2006	1			1	1	1	
AHS035	7/24/2006	1			1	1	1	
AHS036	7/24/2006	1			1	1	1	
AHS037	7/24/2006	1			1	1	1	
AHS038	7/24/2006	1			1	1	1	
AHS039	7/24/2006	1			1	1	1	
AHS040	7/24/2006	1			1	1	1	
AHS041	7/24/2006	1			1	1	1	
AHS042	7/24/2006	1			1	1	1	
AHS043	7/24/2006	1			1	1	1	
AHS044	7/24/2006	1			1	1	1	
AHS045	7/24/2006	1			1	1	1	
AHS046	7/24/2006	1			1	1	1	
AHS047	7/24/2006	1			1	1	1	
AHS048	7/24/2006	1			1	1	1	
AHS049	7/24/2006	1			1	1	1	
AHS050	7/24/2006	1			1	1	1	
AHS051	7/24/2006	1			1	1	1	
AHS052	7/24/2006	1			1	1	1	
AHS053	7/24/2006	1			1	1	1	
AHS054	7/24/2006	1			1	1	1	
AHS055	7/24/2006	1			1	1	1	
AHS056	7/24/2006	1			1	1	1	
AHS057	7/24/2006	1			1	1	1	
AHS058	7/24/2006	1			1	1	1	
AHS059	7/24/2006	1			1	1	1	
AHS060	7/24/2006	1			1	1	1	
AHS061	7/24/2006	1			1	1	1	
AHS062	7/24/2006	1			1	1	1	
AHS063	7/24/2006	1			1	1	1	
Total		Total	Total	Total	Total	Total	Total	Total
		63	0	0	63	63	63	0
% of Test Group		100	0	0	100	100	100	0

Angie Hale - Southwest Region
Date Rec'd: 7/18/2006 Method Sent: Mailbox
Envelope Serial Number

Address: 8641 London Heights San Antonio, TX 78254
Date Mailed: 7/20/2006 Declaration Rec'd
F/C Processed

E-mail: angie.hale@usaa.com
Machine Processed I.D. Tag Bar Code Manually Processed

AHR001	7/24/2006	1				1	1	1
AHR002	7/24/2006	1				1	1	1
AHR003	7/24/2006	1				1	1	1
AHR004	7/24/2006	1				1	1	1
AHR005	7/24/2006	1				1	1	1
AHR006	7/24/2006	1				1	1	1
AHR007	7/24/2006	1				1	1	1
AHR008	7/24/2006	1				1	1	1
AHR009	7/24/2006	1				1	1	1
AHR010	7/24/2006	1				1	1	1
AHR011	7/24/2006	1				1	1	1
AHR012	7/24/2006	1				1	1	1
AHR013	7/24/2006	1				1	1	1
AHR014	7/24/2006	1				1	1	1
AHR015	7/24/2006	1				1	1	1
AHR016	7/24/2006	1				1	1	1
AHR017	7/24/2006	1				1	1	1
AHR018	7/24/2006	1				1	1	1
AHR019	7/24/2006	1				1	1	1
AHR020	7/24/2006	1				1	1	1
AHR021	7/24/2006	1				1	1	1
AHR022	7/24/2006	1				1	1	1
AHR023	7/24/2006	1				1	1	1
AHR024	7/24/2006	1				1	1	1
AHR025	7/24/2006	1				1	1	1
AHR026	7/24/2006	1				1	1	1
AHR027	7/24/2006	1				1	1	1
AHR028	7/24/2006	1				1	1	1
AHR029	7/24/2006	1				1	1	1
AHR030	7/24/2006	1				1	1	1
AHR031	7/24/2006	1				1	1	1
AHR032	7/24/2006	1				1	1	1
AHR033	7/24/2006	1				1	1	1
AHR034	7/24/2006	1				1	1	1
AHR035	7/24/2006	1				1	1	1
AHR036	7/24/2006	1				1	1	1
AHR037	7/24/2006	1				1	1	1
AHR038	7/24/2006	1				1	1	1
AHR039	7/24/2006	1				1	1	1
AHR040	7/24/2006	1				1	1	1
AHR041	7/24/2006	1				1	1	1
AHR042	7/24/2006	1				1	1	1
AHR043	7/24/2006	1				1	1	1
AHR044	7/24/2006	1				1	1	1
AHR045	7/24/2006	1				1	1	1
AHR046	7/24/2006	1				1	1	1
AHR047	7/24/2006	1				1	1	1
AHR048	7/24/2006	1				1	1	1
AHR049	7/24/2006	1				1	1	1
AHR050	7/24/2006	1				1	1	1
AHR051	7/24/2006	1				1	1	1
AHR052	7/24/2006	1				1	1	1
AHR053	7/24/2006	1				1	1	1
AHR054	7/24/2006	1				1	1	1
AHR055	7/24/2006	1				1	1	1
AHR056	7/24/2006	1				1	1	1
AHR057	7/24/2006	1				1	1	1
AHR058	7/24/2006	1				1	1	1
AHR059	7/24/2006	1				1	1	1
AHR060	7/24/2006	1				1	1	1
AHR061	7/24/2006	1				1	1	1
AHR062	7/24/2006	1				1	1	1
AHR063	7/24/2006	1				1	1	1

	Total	Total	Total	Total	Total	Total	Total	Total
	63	0	0	63	63	63	0	
% of Test Group	100	0	0	100	100	100	0	

1. The following is a list of the names of the persons who have been appointed to the various positions in the Department of the Interior, for the year ending June 30, 1901:

Steve Laserson - Great Lakes Region
Date Rec'd: 7/18/2006 Method Sent: Post Office
Envelope Serial Number Date Rec'd

Address: American Greetings One American Road Cleveland, OH 44144
Date: Mailed 7/20/2006 Declaration Rec'd
F/C Processed Manually Cancelled No Cancellation

E-Mail: steve.laserson@amgreetings.com
Machine Processed I.D. Tag Bar Code Manually Processed

SLR001	7/24/2006	1				1	1	1	
SLR002	7/24/2006	1				1	1	1	
SLR003	7/24/2006	1				1	1	1	
SLR004	7/24/2006	1				1	1	1	
SLR005	7/24/2006	1				1	1	1	
SLR006	7/24/2006	1				1	1	1	
SLR007	7/24/2006	1				1	1	1	
SLR008	7/24/2006	1				1	1	1	
SLR009	7/24/2006	1				1	1	1	
SLR010	7/24/2006	1				1	1	1	
SLR011	7/24/2006	1				1	1	1	
SLR012	7/24/2006	1				1	1	1	
SLR013	7/24/2006	1				1	1	1	
SLR014	7/24/2006	1				1	1	1	
SLR015	7/24/2006	1				1	1	1	
SLR016	7/24/2006	1				1	1	1	
SLR017	7/24/2006	1				1	1	1	
SLR018	7/24/2006	1				1	1	1	
SLR019	7/24/2006	1				1	1	1	
SLR020	7/24/2006	1				1	1	1	
SLR021	7/24/2006	1				1	1	1	
SLR022	7/24/2006	1				1	1	1	
SLR023	7/24/2006	1				1	1	1	
SLR024	7/24/2006	1				1	1	1	
SLR025	7/24/2006	1				1	1	1	
SLR026	7/24/2006	1				1	1	1	
SLR027	7/24/2006	1				1	1	1	
SLR028	7/24/2006	1				1	1	1	
SLR029	7/24/2006	1				1	1	1	
SLR030	7/24/2006	1				1	1	1	
SLR031	7/24/2006	1				1	1	1	
SLR032	7/24/2006	1				1	1	1	
SLR033	7/24/2006	1				1	1	1	
SLR034	7/24/2006	1				1	1	1	
SLR035	7/24/2006	1				1	1	1	
SLR036	7/24/2006	1				1	1	1	
SLR037	7/24/2006	1				1	1	1	
SLR038	7/24/2006	1				1	1	1	
SLR039	7/24/2006	1				1	1	1	
SLR040	7/24/2006	1				1	1	1	
SLR041	7/24/2006	1				1	1	1	
SLR042	7/24/2006	1				1	1	1	
SLR043	7/24/2006	1				1	1	1	
SLR044	7/24/2006	1				1	1	1	
SLR045	7/24/2006	1				1	1	1	
SLR046	7/24/2006	1				1	1	1	
SLR047	7/24/2006	1				1	1	1	
SLR048	7/24/2006	1				1	1	1	
SLR049	7/24/2006	1				1	1	1	
SLR050	7/24/2006	1				1	1	1	
SLR051	7/24/2006	1				1	1	1	
SLR052	7/24/2006	1				1	1	1	
SLR053	7/24/2006	1				1	1	1	
SLR054	7/24/2006	1				1	1	1	
SLR055	7/24/2006				1	1	1		I.D. Tag on Front Not Back
SLR056	7/24/2006	1				1	1	1	
SLR057	7/24/2006	1				1	1	1	
SLR058	7/24/2006	1				1	1	1	
SLR059	7/24/2006	1				1	1	1	
SLR060	7/24/2006	1				1	1	1	
SLR061	7/24/2006	1				1	1	1	
SLR062	7/24/2006	1				1	1	1	
SLR063	7/24/2006	1				1	1	1	

	Total	Total	Total	Total	Total	Total	Total	Total	
		62	0	1	63	63	62		0
% of Test Group	98.41269841		0	1.587301587	100	100	98.4127		0

Marianne McDermott - Mid Atlantic Region			Address: 3308 Brandy Court Falls Church, VA 22042			E-mail: marimcd@cox.net		
Date Rec'd: 7/18/2006 Method Sent: Post Office			Date Mailed: 7/20/2006 Declaration Rec'd					
Envelope Serial Number	Date Rec'd	F/C Processed	Manually Cancelled	No Cancellation	Machine Processed	I.D. Tag	Bar Code	Manually Processed
MMDS001	7/24/2006	1				1	1	1
MMDS002	7/24/2006	1				1	1	1
MMDS003	7/24/2006	1				1	1	1
MMDS004	7/24/2006	1				1	1	1
MMDS005	7/24/2006	1				1	1	1
MMDS006	7/24/2006	1				1	1	1
MMDS007	7/24/2006	1				1	1	1
MMDS008	7/24/2006	1				1	1	1
MMDS009	7/24/2006	1				1	1	1
MMDS010	7/24/2006	1				1	1	1
MMDS011	7/24/2006	1				1	1	1
MMDS012	7/24/2006	1				1	1	1
MMDS013	7/24/2006	1				1	1	1
MMDS014	7/24/2006	1				1	1	1
MMDS015	7/24/2006	1				1	1	1
MMDS016	7/24/2006	1				1	1	1
MMDS017	7/24/2006	1				1	1	1
MMDS018	7/24/2006	1				1	1	1
MMDS019	7/24/2006	1				1	1	1
MMDS020	7/24/2006	1				1	1	1
MMDS021	7/24/2006	1				1	1	1
MMDS022	7/24/2006	1				1	1	1
MMDS023	7/26/2006	1				1	1	1
MMDS024	7/24/2006	1				1	1	1
MMDS025	7/24/2006	1				1	1	1
MMDS026	7/24/2006	1				1	1	1
MMDS027	7/24/2006	1				1	1	1
MMDS028	7/24/2006	1				1	1	1
MMDS029	7/24/2006	1				1	1	1
MMDS030	7/24/2006	1				1	1	1
MMDS031	7/24/2006	1				1	1	1
MMDS032	7/24/2006	1				1	1	1
MMDS033	7/24/2006	1				1	1	1
MMDS034	7/24/2006	1				1	1	1
MMDS035	7/24/2006	1				1	1	1
MMDS036	7/24/2006	1				1	1	1
MMDS037	7/24/2006	1				1	1	1
MMDS038	7/24/2006	1				1	1	1
MMDS039	7/24/2006	1				1	1	1
MMDS040	7/24/2006	1				1	1	1
MMDS041	7/24/2006		1			1		1
MMDS042	7/24/2006	1				1	1	1
MMDS043	7/26/2006		1			1		1
MMDS044	7/26/2006			1				1
MMDS045	7/24/2006	1				1	1	1
MMDS046	7/24/2006	1				1	1	1
MMDS047	7/24/2006	1				1	1	1
MMDS048	7/24/2006	1				1	1	1
MMDS049	7/24/2006	1				1	1	1
MMDS050	7/24/2006	1				1	1	1
MMDS051	7/24/2006		1			1		1
MMDS052	7/26/2006	1				1		1
MMDS053	7/24/2006	1				1	1	1
MMDS054	7/24/2006	1				1	1	1
MMDS055	7/24/2006		1			1		1
MMDS056	7/24/2006	1				1	1	1
MMDS057	7/24/2006	1				1	1	1
MMDS058	7/24/2006	1				1	1	1
MMDS059	7/24/2006	1				1	1	1
MMDS060	7/24/2006	1				1	1	1
MMDS061	7/24/2006		1			1		1
MMDS062	7/24/2006	1				1	1	1
MMDS063	7/26/2006		1			1		1
Total		Total	Total	Total	Total	Total	Total	Total
		56	6	1	62	53	62	1
% of Test Group		88.88888889	9.523809524	1.587301587	98.41269841	84.12698	98.41269841	1.587301587

MMDR001	7/24/2006	1				1	1		1
MMDR002	7/24/2006	1				1	1		1
MMDR003	7/24/2006	1				1	1		1
MMDR004	7/24/2006	1				1	1		1
MMDR005	7/24/2006	1				1	1		1
MMDR006	7/24/2006	1				1	1		1
MMDR007	7/24/2006	1				1	1		1
MMDR008	7/24/2006	1				1	1		1
MMDR009	7/24/2006	1				1	1		1
MMDR010	7/24/2006	1				1	1		1
MMDR011	7/24/2006	1				1	1		1
MMDR012	7/24/2006	1				1	1		1
MMDR013	7/24/2006	1				1	1		1
MMDR014	7/24/2006	1				1	1		1
MMDR015	7/24/2006	1				1	1		1
MMDR016	7/24/2006	1				1	1		1
MMDR017	7/24/2006	1				1	1		1
MMDR018	7/24/2006	1				1	1		1
MMDR019	7/24/2006	1				1	1		1
MMDR020	7/24/2006	1				1	1		1
MMDR021	7/24/2006	1				1	1		1
MMDR022	7/24/2006	1				1	1		1
MMDR023	7/24/2006	1				1	1		1
MMDR024	7/24/2006	1				1	1		1
MMDR025	7/24/2006	1				1	1		1
MMDR026	7/24/2006	1				1	1		1
MMDR027	7/24/2006	1				1	1		1
MMDR028	7/24/2006	1				1	1		1
MMDR029	7/24/2006	1				1	1		1
MMDR030	7/24/2006	1				1	1		1
MMDR031	7/24/2006	1				1	1		1
MMDR032	7/24/2006			1		1	1		1
MMDR033	7/24/2006	1				1	1		1
MMDR034	7/24/2006	1				1	1		1
MMDR035	7/24/2006	1				1	1		1
MMDR036	7/24/2006	1				1	1		1
MMDR037	7/24/2006	1				1	1		1
MMDR038	7/24/2006	1				1	1		1
MMDR039	7/24/2006	1				1	1		1
MMDR040	7/24/2006	1				1	1		1
MMDR041	7/24/2006	1				1	1		1
MMDR042	7/24/2006	1				1	1		1
MMDR043	7/24/2006	1				1	1		1
MMDR044	7/24/2006	1				1	1		1
MMDR045	7/24/2006	1				1	1		1
MMDR046	7/24/2006	1				1	1		1
MMDR047	7/24/2006	1				1	1		1
MMDR048	7/24/2006	1				1	1		1
MMDR049	7/24/2006	1				1	1		1
MMDR050	7/24/2006	1				1	1		1
MMDR051	7/24/2006	1				1	1		1
MMDR052	7/24/2006	1				1	1		1
MMDR053	7/24/2006	1				1	1		1
MMDR054	7/24/2006	1				1	1		1
MMDR055	7/24/2006	1				1	1		1
MMDR056	7/24/2006	1				1	1		1
MMDR057	7/24/2006	1				1	1		1
MMDR058	7/24/2006	1				1	1		1
MMDR059	7/24/2006	1				1	1		1
MMDR060	7/24/2006	1				1	1		1
MMDR061	7/24/2006	1				1	1		1
MMDR062	7/24/2006	1				1	1		1
MMDR063	7/24/2006	1				1	1		1

	Total	Total	Total	Total	Total	Total	Total	
		62	0	1	63	63	63	0
% of Test Group	98.41269841		0	1.587301587	100	100	100	0

Hamilton Davison - Northeast Region			Address: Paramount Cards, Inc. 400 Pine Street Pawtucket, RI 02860			E-mail: hdavison@paramountcards.com		
Date Rec'd: 7/19/2006 Method Sent: 1/2 Office Pickup			Date Mailed: 7/20/2006 Declaration Rec'd					
Envelope Serial Number	Date Rec'd	F/C Processed	Manually Cancelled	No Cancellation	Machine Processed	I.D. Tag	Bar Code	Manually Processed
HDS001	7/24/2006				1			1
HDS002	7/24/2006				1			1
HDS003	7/24/2006	1				1	1	
HDS004	7/24/2006				1			1
HDS005	7/24/2006				1			1
HDS006	7/24/2006	1				1	1	
HDS007	7/24/2006	1				1	1	
HDS008	7/24/2006	1				1	1	
HDS009	7/24/2006	1				1	1	
HDS010	7/24/2006				1			1
HDS011	7/24/2006	1				1	1	
HDS012	7/24/2006	1				1	1	
HDS013	7/24/2006	1				1	1	
HDS014	7/24/2006	1				1	1	
HDS015	7/24/2006	1				1	1	
HDS016	7/24/2006				1			1
HDS017	7/24/2006				1			1
HDS018	7/24/2006	1				1	1	
HDS019	7/24/2006	1				1	1	
HDS020	7/24/2006	1				1	1	
HDS021	7/24/2006	1				1	1	
HDS022	7/24/2006				1			1
HDS023	7/24/2006	1				1	1	
HDS024	7/24/2006				1			1
HDS025	7/24/2006	1				1	1	
HDS026	7/24/2006	1				1	1	
HDS027	7/24/2006	1				1	1	
HDS028	7/24/2006	1				1	1	
HDS029	7/24/2006	1				1	1	
HDS030	7/24/2006	1				1	1	
HDS031	7/24/2006	1				1	1	
HDS032	7/24/2006		1					1
HDS033	7/26/2006				1			1
HDS034	7/26/2006				1			1
HDS035	7/24/2006	1				1	1	
HDS036	7/24/2006	1				1	1	
HDS037	7/26/2006				1			1
HDS038	7/24/2006	1				1	1	
HDS039	7/24/2006				1			1
HDS040	7/24/2006				1			1
HDS041	8/8/2006	1				1	1	1
HDS042	7/24/2006	1				1	1	I.D. Tag crossed out.
HDS043	7/24/2006	1				1	1	
HDS044	7/24/2006	1				1	1	
HDS045	7/24/2006	1				1	1	
HDS046	7/24/2006	1				1	1	
HDS047	7/24/2006	1				1	1	
HDS048	7/24/2006	1				1	1	
HDS049	7/24/2006	1				1	1	
HDS050	7/24/2006	1				1	1	
HDS051	7/24/2006	1				1	1	
HDS052	7/24/2006	1				1	1	
HDS053	7/24/2006	1				1	1	
HDS054	7/24/2006	1				1	1	
HDS055	7/24/2006	1				1	1	1
HDS056	7/24/2006	1				1	1	
HDS057	7/24/2006	1				1	1	
HDS058	7/24/2006	1				1	1	
HDS059	7/24/2006	1				1	1	
HDS060	7/24/2006	1				1	1	
HDS061	7/24/2006	1				1	1	
HDS062	7/24/2006	1				1	1	
HDS063	7/24/2006	1				1	1	
Total		48	Total		1	Total		14
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48	Total		14	Total		48
Total		48						

Hamilton Davison - Northeast Region
Date Rec'd: 7/19/2006 Method Sent: 1/2 Office Pickup
Envelope Serial Number

Address:
Date Rec'd
F/C Processed

Paramount Cards, Inc. 400 Pine Street Pawtucket, RI 02860
7/20/2006 Declaration Rec'd
Manually Cancelled No Cancellation

E-mail: hdavison@paramountcards.com
Machine Processed I.D. Tag Bar Code Manually Processed

HDR001	7/24/2006	1			1	1		
HDR002	7/24/2006	1			1	1		
HDR003	7/24/2006	1			1	1		
HDR004	7/24/2006	1			1	1		
HDR005	7/24/2006	1			1	1		
HDR006	7/24/2006	1			1	1		
HDR007	7/24/2006	1			1	1		
HDR008	7/24/2006	1			1	1		
HDR009	7/24/2006	1			1	1		
HDR010	7/24/2006	1			1	1		
HDR011	7/24/2006	1			1	1		
HDR012	7/24/2006	1			1	1		
HDR013	7/24/2006	1			1	1		
HDR014	7/24/2006	1			1	1		
HDR015	7/24/2006	1			1	1		
HDR016	7/24/2006	1			1	1		
HDR017	7/24/2006	1			1	1		
HDR018	7/24/2006	1			1	1		
HDR019	7/24/2006	1			1	1		
HDR020	7/24/2006	1			1	1		
HDR021	7/24/2006	1			1	1		
HDR022	7/24/2006	1			1	1		
HDR023	7/24/2006	1			1	1		
HDR024	7/24/2006	1			1	1		
HDR025	7/24/2006	1			1	1		
HDR026	7/24/2006	1			1	1		
HDR027	7/24/2006	1			1	1		
HDR028	7/24/2006	1			1	1		
HDR029	7/24/2006	1			1	1		
HDR030	7/24/2006	1			1	1		
HDR031	7/24/2006	1			1	1		
HDR032	7/24/2006	1			1	1		
HDR033	7/24/2006	1			1	1		
HDR034	7/24/2006	1			1	1		
HDR035	7/24/2006	1			1	1		
HDR036	7/24/2006	1			1	1		
HDR037	7/24/2006	1			1	1		
HDR038	7/24/2006	1			1	1		
HDR039	7/24/2006	1			1	1		
HDR040	7/24/2006	1			1	1		
HDR041	7/24/2006	1			1	1		
HDR042	7/24/2006	1			1	1		
HDR043	7/24/2006	1			1	1		
HDR044	7/24/2006	1			1	1		
HDR045	7/24/2006	1			1	1		
HDR046	7/24/2006	1			1	1		
HDR047	7/24/2006	1			1	1		
HDR048	7/24/2006	1			1	1		
HDR049	7/24/2006	1			1	1		
HDR050	7/24/2006	1			1	1		
HDR051	7/24/2006	1			1	1		
HDR052	7/24/2006	1			1	1		
HDR053	7/24/2006	1			1	1	1	
HDR054	7/24/2006	1			1	1		
HDR055	7/24/2006	1			1	1		
HDR056	7/24/2006	1			1	1		
HDR057	7/24/2006	1			1	1		
HDR058	7/24/2006	1			1	1		
HDR059	7/24/2006	1			1	1		
HDR060	7/24/2006	1			1	1		
HDR061	7/24/2006	1			1	1		
HDR062	7/24/2006	1			1	1		
HDR063	7/24/2006	1			1	1		
Total		63	Total	0	Total	63	Total	1
% of Test Group		100		0		100	1.587302	0

Exhibit C

Greeting Card Association Proposed DMCS Provision

221 Letters and Sealed Parcels Subclass

* * *

221.21 Single-Piece Rate Category. The single-piece rate category applies to regular rate Letters and Sealed Parcels subclass mail not mailed under section 221.22 or 221.24.

221.211 Letters. The letter rates apply to pieces that are letter-shaped as specified by the Postal Service, and either are not nonmachinable as defined in 232, or are low aspect ratio mail as defined in 233.

221.212 Flats. The flat rates apply to pieces that are flat-shaped as specified by the Postal Service. Letter-size pieces that are nonmachinable as defined in 232 (except low aspect ratio pieces as defined in 233) are subject to the flat rates.

* * *

230 PHYSICAL LIMITATIONS

* * *

232 Nonmachinable Mail

Letters and Sealed Parcels subclass mail is nonmachinable if:

- a. Its aspect ratio ~~does not fall between 1 to 1.3 and~~ is greater than 1 to 2.5 ~~inclusive~~; it exceeds any of the following dimensions:
 - i. 11.5 inches in length;
 - ii. 6.125 inches in width; or
 - iii. 0.25 inch in thickness; or

b. It does not meet the letter machinability requirements of the Postal Service;

* * *

233 Low Aspect Ratio Mail

A letter-shaped piece in the single-piece rate category whose aspect ratio is less than 1 to 1.3, but which is otherwise not nonmachinable as defined in 232, is subject to the low aspect ratio surcharge.